1	JAMES R. MCGUIRE (CA SBN 189275) NATALIE NAUGLE (CA SBN 240999) MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone 415 268 7000	
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4	Telephone: 415.268.7000 Facsimile: 415.268.7522	
5	Attorneys for Defendants WELLS FARGO & COMPANY, WACHOVIA MORTGAGE CORPORATION, WACHOVIA BANK, N.A., WACHOVIA SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL NETWORK, LLC	
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	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO DIVISION	
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12	JORGE V. RAGDE, JR. AND JENNIFER J.	Case No. C 09-0226-SI
13	RAGDE, On Behalf of themselves and All Others Similarly Situated,	STIPULATION AND
14		[PROPOSED] ORDER FOR
15	Plaintiff,	EXTENSION OF TIME TO RESPOND TO COMPLAINT AND
16	V.	CONTINUE INITIAL CASE MANAGEMENT CONFERENCE
17	WELLS FARGO & COMPANY, WACHOVIA MORTGAGE CORPORATION, WACHOVIA	AND RELATED DEADLINES
18	BANK, N.A., WACHOVIA SEĆURITIES, LLC, WACHOVIA SECURITIES FINANCIAL	
	NETWORK, LLC, WACHOVIA	
19	CORPORATION, and DOES 1-10 Inclusive,	
20	Defendants.	
21	WHEREAS, on February 18, 2009, the parties submitted an amended stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to April 2, 2009;	
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23	WHEREAS, the Initial Case Management Conference in this matter is currently scheduled	
24	for Friday, April 24, 2009 at 2:00 p.m.; WHEREAS, the Parties' Rule 26(f) Report and Joint Case Management Statement are currently due April 17, 2009, 7 days prior to the Initial Case Management Conference;	
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26		
27	currently due rapin 17, 2007, 7 days prior to the fill	iai Case Management Contentice,
28		
	STIP FOR EXTENSION OF TIME TO RESPOND TO COMPL	AINT AND CONTINUE INITIAL CMC

WHEREAS, the Parties are currently required to file ADR Certifications and a Stipulation to ADR Process or Notice of Need for ADR Phone Conference by April 3, 2009, 21 days prior to the Initial Case Management Conference;

WHEREAS, the Parties, through their counsel, have engaged in preliminary discussions regarding the circumstances giving rise to the allegations in the complaint in the hope of resolving the issues presented in plaintiffs' complaint without further litigation;

WHEREAS, the parties wish to continue that process without incurring unnecessary expense;

IT IS HEREBY STIPULATED AND AGREED pursuant to Local Rule 6-1(a), and Federal Rule of Civil Procedure 12(a), by and between plaintiffs Jorge V. Ragde, Jr. and Jennifer J. Ragde and defendants Wells Fargo & Company, Wachovia Mortgage Corporation, Wachovia Bank, N.A., Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Wachovia Corporation, through their respective attorneys, that the time by which defendants may plead or otherwise respond to the Complaint shall be extended to and include Monday, May 4, 2009.

IT IS FURTHER STIPULATED AND AGREED pursuant to Northern District Local Rules 6-2(a), 7-12, and 16-2(e), that the Initial Case Management Conference currently scheduled for Friday, April 24, 2009, shall be continued to Friday, May 29, 2009 or any date thereafter at the Court's convenience. Additionally, in accordance with FRCP 26(f) and Local Rule 16-9(a), the Parties Rule 26(f) Report and Joint Case Management Conference Statement will be due seven (7) days prior to the rescheduled Initial Case Management Conference. The ADR Certifications and a Stipulation to ADR Process or Notice of Need for ADR Phone Conference will be due twenty-one (21) days prior to the rescheduled Initial Case Management Conference.

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Caseas: 09:00-0002206286-SID obcomment 11213 Filled 003/301/20909Pageage 134 of 4 1 Dated: March 30, 2009 JEFFREY F. KELLER 2 DENISE L. DÍAZ KELLER GROVER LLP. 3 4 By /s/ Denise L. Díaz Denise L. Díaz 5 Attorneys for Individual and Representative 6 Plaintiff JORGE V. RAGDE, JR. and JENNIFER J. RAGDE 7 Dated: March 30, 2009 JAMES R. McGUIRE 8 NATALIE NAUGLE MORRISON & FOERSTER LLP 9 10 /s/ James R. McGuire By 11 James R. McGuire 12 Attorneys for Defendant WELLS FARGO & COMPANY, WACHOVIA MORTGAGE 13 CORPORATION, WACHOVIA BANK, N.A., WACHOVIA SECURITIES, LLC, WACHOVIA 14 SECURITIES FINANCIAL NETWORK, LLC, WACHOVIA CORPORATION 15 PURSUANT TO STIPULATION, IT IS SO ORDERED. 16 17 Dated: 18 Judge Susan Illston

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GENERAL ORDER 45 ATTESTATION In accordance with General Order 45, concurrence in the filing of this document has been obtained from Denise L. Diaz and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party. Date: March 30, 2009 /s/ James R. McGuire By James R. McGuire Attorneys for Defendant WELLS FARGO & COMPÁNY, WACHOVIA MORTGAGE CORPORATION, WACHOVIA BANK, N.A., WACHOVIA SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL NETWORK, LLC, WACHOVIA CORPORATION